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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

JAN - 8 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of

Amendment of the Commission's
Rules to Establish New Personal
Communications Services

GEN Docket No. 90-314
ET Docket No. 92-100

RM-7140, RM-7611,
RM-7618, RM 7702,
RM-7860, RM-7971,
RM-7979, RM-7981

PP-35 through PP-40,
PP-79 through PP-85

To: The Commission

**REPLY COMMENTS OF
PULSON COMMUNICATIONS CORPORATION**

Pulson Communications Corporation ("Pulson"), by its attorneys, hereby submits its reply comments regarding the Notice of Proposed Rule Making and Tentative Decision, FCC 92-333, released August 14, 1992 ("NPRM"). For its reply, Pulson states as follows:

1. Pulson trusts that the myriad comments in this proceeding give further assurance that there are both an immediate need for a personal communications service ("PCS"), and an active willingness on the part of several qualified entities to provide such service. Accordingly, Pulson does not perceive any need for further comments in support of the establishment of such a service.

2. Several commenters addressed the question of how many PCS frequency blocks should be allocated in each service area. Pulson

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again urges the Commission to allocate at least three PCS frequency blocks in each such area.^{1/}

3. No matter what number of frequency blocks the Commission decides to allocate to each PCS service area, Pulson again urges the Commission to reserve at least one block in each area for future use by developers of innovative technologies suitable for PCS. Such reservation, as outlined in Pulson's November 9, 1992 comments in this proceeding, would provide continuing incentive for the development of advanced technologies which are not presently deemed available for use in PCS.

4. Pulson opposes the proposal set forth by MCI Telecommunications Corporation ("MCI"), which proposal advocates the issuance of three national PCS licenses. Although three licenses per market area should satisfy initial demand for PCS, the bundling of those licenses into "national" authorizations will effectively preclude the participation in PCS of small, but otherwise qualified, providers of telecommunications services. Small and start-up companies have traditionally been the main sources of innovative and efficient communications technologies and practices. To preclude participation by such companies would be counterproductive in a pioneering service such as PCS.

^{1/} Pulson agrees with the Commission's stated inclination to define PCS service areas on some basis other than presently existing communications service areas (e.g., cellular markets). Specifically, Pulson supports the proposals of those parties suggesting service areas based on socio-economic affinity (e.g., the proposal of American Personal Communications).

5. Pulson believes that nationwide PCS service can be most efficiently and expeditiously provided through alliances among those licensees from each regional market who offer compatible PCS services. Such arrangements would allow for the tailoring of PCS services to the respective service areas, while at the same time providing ample opportunity for the development of nationwide networks.

Respectfully submitted,

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January 8, 1992


CERTIFICATE OF SERVICE

I hereby certify that on this 8th day of January, 1993, I mailed a copy of the foregoing "Reply Comments of Pulson Communications Corporation" via first-class United States mail, postage prepaid, to the following:

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